

REMARKS

Applicants acknowledge that the Examiner has considered the references cited with the Information Disclosure Statement filed August 9, 2001.

Status of the Application

Claims 1-42 are all the claims pending in the Application, as claims 37-42 are hereby added to more fully define the current invention. Claims 1, 2, 4-8, 10, 13, 14, 16-20, 22, 25, 26, 28-30, 32 and 34 have been rejected.

Claims 1, 2, 3, 13, 14, 25, 26 and 27 are amended to correct typographical errors. These amendments are editorial in nature, are not for the purposes of patentability, and therefore do not create any estoppel.

Allowable Subject Matter

Applicants acknowledge that the Examiner has indicated that claims 3, 9, 11, 12, 15, 21, 23, 24, 27, 31, 33, 35 and 36 would be allowed if rewritten in independent form. However, Applicant respectfully requests that the Examiner hold in abeyance such rewriting until the Examiner has had an opportunity to reconsider (and withdraw) the prior art rejection of the other claims.

Claim Rejection

The Examiner has rejected claims 1, 2, 4-8, 10, 13, 14, 16-20, 22, 25, 26, 28-30, 32 and 34 under 35 U.S.C. § 102(b) as being anticipated by *Yonemitsu et al.* (US 5,596,565; hereinafter "*Yonemitsu*"). This rejection is respectfully traversed.

The Instant Application

The instant Application is directed, *inter alia*, to storage of multimedia content of different formats, such as video files of different resolution, and determining a relationship therebetween. More specifically, as shown in the exemplary embodiment of FIG. 2B, a timecode 104 that is superimposed on an image frame 103 of a first stored video 101 is read (in this example video 101 is low resolution video), along with a corresponding number of a frame 102. This read timecode information is then used to find a corresponding frame 106 in a second stored video 105 (a high resolution version of video 101).¹

Yonemitsu

In contrast to the instant Application, *Yonemitsu* is directed to a specific method of improving data storage on an optical disk (col. 1, lines 11-51). *Yonemitsu's* method utilizes Table of Contents (TOC) data in addition to the user data on the disk, where the user data includes sector headers with subcode information describing the user data (col 7, lines 29-32; 55-60). The user data is subject to error correction encoding (col. 8, lines 8-9) which is conducted by assembling a "frame of data bytes or symbols, referred to as a C2 code word formed of, for example, 116 bytes or symbols."

The TOC data includes disc information, track information, disc type, etc. (col. 12, line 37 - col. 14, line 55). The track information of the TOC data further includes track number, start and end sector addresses, and time code at start point (col. 15, line 17 - col. 16, line 19). Each

¹ This discussion is provided as an assistance to the Examiner, and is not intended to limit the scope of the pending claims in any way.

sector of user information also includes TOC data, including sync information, address, and subcode information (col. 16, line 52 - col. 17, line 40), where the subcode information may include time code information for stored video information (col 18, lines 1-10).

Yonemitsu Fails to Teach or Suggest The Features of Independent Claims 1, 13 and 25

Yonemitsu has nothing at all to do with synchronizing content of different formats. Rather, *Yonemitsu* is directed to an improvement on how to store information on an optical disk so as to improve access time and reduce errors (col. 1, lines 36-55). In fact, the only similarity between *Yonemitsu* and the instant Application is that both discuss the use of compressed video files.

Regarding the rejected claims, Applicants respectfully submit that *Yonemitsu* is deficient with respect to almost all of the features recited in independent claims 1, 13 and 25.

For example, Applicants respectfully submit that *Yonemitsu* fails to teach or suggest any “first content having timecodes superimposed on its frames.” There is simply no mention in *Yonemitsu* of any “superimposed timecodes.” Timecodes are only mentioned in terms of stored information in TOC data.

Further, the Examiner’s indication that FIG. 14 somehow shows a “frame” as recited in the claims is incorrect. FIG. 14 illustrates “a tabular representation of time-code data that may be recorded as the subcode information in a sector.” As discussed above, the subcode information in *Yonemitsu* is part of the TOC data, not part of a “frame.”

Still further, Applicants respectfully submit that *Yonemitsu* fails to teach or suggest any determination of such “superimposed timecodes of first and second representative frames,” and

any determination of the “frame numbers corresponding to the first and second representative frames.”

Specifically, *Yonemitsu* only indicates that timcode information is stored in the TOC data. It does not disclose any particular use of such timcode information, or the determination of frame numbers of the stored data that correspond to the timcode information.

Thus, Applicants respectfully submit that independent claims 1, 13 and 25 are patentable over the applied reference. Further, Applicants respectfully submit that rejected dependent claims 2, 4-7, 8, 10, 14, 16-19, 20, 22, 26, 28-30, 32 and 34 are allowable, *at least* by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

New Claims

Claims 37-42 are hereby added. Claims 37-39 are fully supported *at least* by 8-10 of the instant Application. Claims 40-42 are similar to claims 1, 13 and 25, but recite the features of the invention in different language.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-42 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-42.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.111
U.S. Appln. No.: 09/829,543

Attorney Docket # A8769 /
SVL920010030US1

Please charge any fees which may be required to maintain the pendency of this
application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



Timothy P. Cremen
Registration No. 50,855

SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-3213
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: July 29, 2004